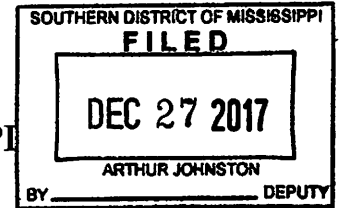


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v. CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

**RESPONSE TO DEFENDANT/COUNTERCLAIMANT LEARY'S
MOTION FOR PARTIAL SUMMARY JUDGMENT (ECF 202)**

Plaintiff Douglas Handshoe respectfully submits this response to defendant Leary's Motion for Partial Summary Judgment (ECF #202) and will show that the defendant's Motion should be denied.

Leary posits for the Court that two of his counterclaims are candidates for a judgment in the count related to his Section 362 counter claim and the Count related to Copyright Infringement. As Plaintiff will show in the Memorandum filed in support of this response, Leary has not advanced any credible legal theory upon which he can prevail and there are material facts in dispute with respect to his Copyright Infringement Counterclaim. Further, a plain read of the section of Leary's memorandum regarding his Copyright Infringement Counterclaim clearly

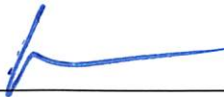
indicates it is in reality, an out of time rebuttal of Plaintiff's Motion to Dismiss (ECF Nos. 187 and 198) as Leary again argues his claim is not time barred. In any event Leary's fanciful rendition of "irrefutable facts" regarding both of his claims rise to the level of sanctionable conduct that is tantamount to a needless wasting of this Court's time and resources.

Attached to this response are the following exhibits:

- Declaration of Douglas Handshoe
- Copyright Registration TX 8-363-272 dated March 8, 2017

These matters are more fully explained in the contemporaneously filed Memorandum in Support of this Response.

Respectfully submitted this 27th day of December, 2017,



Plaintiff
Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on December 27, 2017 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on December 27, 2017 I mailed the foregoing to Charles Leary and Vaughn Perret at their address of record at 140 Trout Point Road, E. Kemptville, NS B5A 5X9 Canada.

Respectfully submitted this 27th day of December, 2017,



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